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♦ also admitted in PA
† also admitted in NY
● also admitted in CT
■ also admitted in FL

November 21, 2005

VIA ELECTRONIC MAIL

Clerk of Court
United States District Court
District of Massachusetts
One Courthouse Way, Suite 2300
Boston, MA 02210

Re: Joseph H. Koran, et al vs. Elizabeth Weaver, et al
Civil Action No. 05-11454 RGS
Our File No.: 282-0403288

Dear Sir or Madam:

Pursuant to Fed.R.Civ.P. 26(f) and Local Rule 16.1(D), enclosed for filing please find the Joint Statement agreed to by all Parties in the above-referenced matter.

Thank you for your attention to this matter.

Sincerely,

PIERCE, DAVIS & PERRITANO, LLP



John J. Cloherty III
Darlene M. Tonucci

Enclosure

cc: Carmen L. Durso, Esq. (via e-mail)
Robert C. Gabler, Esq. (via e-mail)
Dragan A. Cetkovic, Esq. (via mail and facsimile)

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION No. 05-11454 RGS

<p>JOSEPH H. KORAN, and KIMBERLY KORAN, Individually and on Behalf of ANA KORAN, JOSEPH KORAN, JR. and ERIK KORAN, Minors,</p> <p style="text-align: right;">Plaintiffs,</p> <p>v.</p> <p>ELIZABETH WEAVER, and TOWN OF SHERBORN,</p> <p style="text-align: right;">Defendants.</p>

JOINT STATEMENT

Pursuant to Local Rule 16.1(D) and this Court's Notice of Scheduling Conference, the parties hereby report to the Court as follows:

I. AGENDA FOR SCHEDULING CONFERENCE

The parties suggest the following agenda of matters to be discussed at the conference:

- A. The proposed scheduling plan for discovery and motions;
- B. The positions of the parties regarding settlement.

II. COMPLIANCE WITH LOCAL RULE 16.1(D)

- A. Discovery will end on August 30, 2006;
- B. Plaintiffs will disclose their expert(s) by September 29, 2006;
- C. Defendants will disclose their expert(s) by October 30, 2006;
- D. All Expert Depositions shall be completed by November 29, 2006.
- E. Dispositive Motions:
 - 1. Dispositive Motions shall be filed by December 29, 2006;

2. Responses to dispositive motions will be filed by January 29, 2007;
3. Oral Argument on the motions will take place before February 28, 2007 or such other time as the Court deems appropriate.

F. Pretrial Conference:

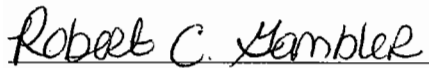
1. The parties request a pretrial conference after a decision on the dispositive motions;
2. The parties suggest March 30, 2007 with trial scheduled in the weeks following.

III. CERTIFICATIONS:

Certifications required by L.R. 16.1(D)(3) have been filed separately with the Court.

Respectfully submitted,

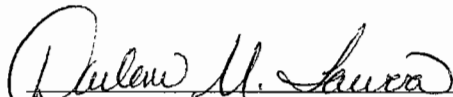
The Plaintiffs,
JOSEPH H. KORAN and KIMBERLY
KORAN, Individually and on Behalf of
ANA KORAN, JOSEPH KORAN, JR.
and ERIK KORAN, Minors,
By their attorneys,

 (initials)

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(617) 728-9123

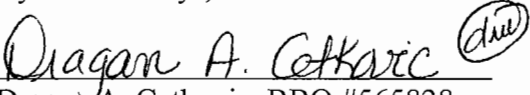
The Defendant,
TOWN OF SHERBORN,
By its attorneys,

PIERCE, DAVIS & PERRITANO, LLP



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The Defendant,
ELIZABETH WEAVER,
By her attorneys,


Dragan A. Cetkovic, BBO #565828
Black, Cetkovic & Whitestone
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Boston, MA 02116
(617) 236-1900

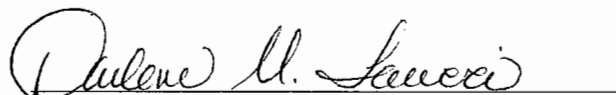
Dated: November 21, 2005

CERTIFICATE OF SERVICE

I, Darlene M. Tonucci, attorney for the defendant in the above-entitled action, hereby certify that I served upon counsel of record a copy of the foregoing by electronically filing with the U.S. District Court, and by mail to:

Dragan A. Cetkovic, Esq.
Black, Cetkovic & Whitestone
200 Berkeley Street
Boston, MA 02116

on this 21st day of November, 2005.


Darlene M. Tonucci